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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
10 **WESTERN DIVISION**
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12 **Caravan Canopy Int'l, Inc., a**
13 California corporation,

14 Plaintiff,

15 v.

16 **Impact Images, Inc., a California**
17 corporation,

18 Defendant.

Case No. 8:23-cv-00345

**COMPLAINT FOR PATENT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

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20 For its Complaint, Plaintiff Caravan Canopy Int'l, Inc. hereby alleges as
21 follows:

22 **JURISDICTION AND VENUE**

23 1. This is an action including for infringement under the patent laws of the
24 United States, 35 U.S.C. § 101, *et seq.* This Court has subject matter jurisdiction
25 including under 28 U.S.C. §§ 1331 and 1338(a).

26 2. This Court has personal jurisdiction over Defendant because it is
27 headquartered and/or has its primary place of business in this District, where it has
28 committed the infringing acts alleged herein.

1 hole to a second position not extending into the second hole;” (f) “and a biasing
 2 member biasing the pull pin toward the first position to relatively lock the first rod
 3 or pole and the second rod or pole when the first hole is superimposed on the second
 4 hole,” (g) “wherein the main body is fixed against movement along the first rod or
 5 pole when the pull pin is in the second position,” (h) “wherein the first rod or pole
 6 further comprises a third notch or hole and wherein the main body is fixed against
 7 movement along the first rod or pole in the second position by a boss extending
 8 between the main body and the first rod or pole,” (i) “and wherein the boss is
 9 formed on a resilient tab on the main body, the boss extending into the central
 10 hollow to engage the third notch or hole of the first rod or pole.”

11 10. Claim 19 of the ‘657 patent, for example, is directed to “A pull pin
 12 assembly according to claim 18 wherein resilient tab is cut out from the main body.”

13 11. On information and belief, Defendant has made, used, offered for sale,
 14 sold and/or imported into the United States products covered by the claims of the
 15 ‘657 patent. For example, the following products infringe at least Claims 18 and 19
 16 of the ‘657 patent: 10x10 Industrial Steel Pop Up Canopy Tent with Roller Bag –
 17 DS, 10x10 Heavy Duty Steel Pop up Canopy Tent with Roller Bag – CL, 10x10
 18 Super Duty Aluminum Pop up Canopy Tent with Roller Bag - M Series, 10x10
 19 Industrial Aluminum Pop up Canopy Tent with Roller Bag - ML Series, iMega
 20 Series, Alumix Pop Up Canopy Tent, Impact Canopy AOL 10 x 10 Easy Pop Up
 21 Canopy Commercial Grade Tent - 4 Matching Sidewalls, and Evento Pop Up
 22 Canopy Tent. This list is by way of example and may not be an exhaustive list.

23 12. On information and belief, Defendant has caused, encouraged and
 24 aided others, including customers, to directly infringe the ‘657 patent having full
 25 knowledge of the ‘657 patent and the specific intent that its acts and the acts of its
 26 customers and/or others to directly and/or indirectly infringe the ‘657 patent.

JURY TRIAL DEMAND

Pursuant to Fed. R. Civ. P. 38(b)(1) and (c), and L.R. 38-1, Plaintiff hereby demands a jury trial on all the issues in this action so triable of right by a jury.

Respectfully submitted,

Dated: February 27, 2023

SML AVVOCATI P.C.

By: /s/ Stephen M. Lobbin
Attorneys for Plaintiff